

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI  
ABERDEEN DIVISION

IN RE:	)	BANKRUPTCY CASE
	)	
DEWAYNE JONES,	)	NO.: 21-12407-JDW
	)	
Debtor.	)	CHAPTER 13
	)	
	)	
	)	

OBJECTION TO CONFIRMATION

COMES NOW Freedom Mortgage Corporation (hereinafter known as "Creditor"), a secured creditor holding a Deed of Trust against the real property commonly known as 140 Pinewood Drive, Holly Springs, MS 38635 (the "Property"), and for the reasons stated below, objects to confirmation of Debtor's Amended Chapter 13 plan (Doc. No. 7) (the "Plan").

1.

Debtor's Plan underestimates the prepetition arrearage amount owed to Creditor as \$0.00. The actual prepetition arrearage amount owed to Creditor is approximately \$11,441.84. This may cause the plan to be unfeasible.

2.

Creditor reserves the right to raise the failure of Debtor to have made plan payments if at the time of the confirmation hearing that appears to be the case.

WHEREFORE, Creditor prays that the Court will:

1. deny confirmation,
2. award reasonable attorney's fees, and
3. grant such other and further relief as is just and equitable.

/s/ Karen A. Maxcy

Karen A. Maxcy  
MS BAR NO. 8869  
Attorney for Creditor  
McCalla Raymer Leibert Pierce, LLC  
1544 Old Alabama Road  
Roswell, GA 30076

678-321-6965  
Karen.Maxcy@mccalla.com

**CERTIFICATE OF SERVICE**

I, Karen A. Maxcy, of McCalla Raymer Leibert Pierce, LLC, do hereby certify that on this date, I served a copy the above OBJECTION TO CONFIRMATION filed in this bankruptcy matter on the following parties at the addresses shown, through the Court's ECF/CMF system, and/or via U.S. Mail First Class, postage prepaid and properly addressed, to-wit:

Dewayne Jones  
140 Pinewood Drive  
Holly Springs, MS 38635

Robert Hudson Lomenick, Jr. (served via ECF Notification)  
P.O. Box 417  
Holly Springs, MS 38635

Locke D. Barkley, Trustee (served via ECF Notification)  
6360 I-55 North  
Suite 140  
Jackson, MS 39211

CERTIFIED, this the 31st day of January, 2022

/s/Karen A. Maxcy  
Karen A. Maxcy